

EXHIBIT B

**Mr. Giuliani's Statements at Issue in *Freeman v. Giuliani*,
No. 1:21-cv-3354-BAH (D.D.C. May 10, 2022)**

DEFAMATORY STATEMENT	
Direct Liability	
Giuliani Presidential Legal Defense Team, Strategic Communications Plan (Dec. 27, 2020), https://perma.cc/VP2S-CJMR (on or after December 23, 2020) ¹	
	“MASSIVE CORRUPTION IN THE ELECTION PROCESS LED TO A VOTE TALLY THAT IS FRAUDULENT . . . Fraudulent Ballots . . . Fulton County, GA, video of suitcases of fraudulent ballots.”
	“Election Official Ruby Freeman is seen surreptitiously & illegally handing off hard-drives ON CAMERA in the Georgia counting facility.”
	“YOU CANNOT LET AMERICA ITSELF BE STOLEN BY CRIMINALS – YOU MUST TAKE A STAND AND YOU MUST TAKE IT TODAY.”
	“Video of Ruby and Shay [sic] at midnight . . . That is the time of the 200,000 vote bump . . . No Watermain Break – a lie to get the Republican observers and media to leave at 10:30pm.”
	““Suitcase Gate” - Video of ‘ballot stuffing’ when ‘suitcases’ (container type) filled with ballots (approximately 6,000 in each container) were rolled out from under table at GA arena and placed in tabulation machines (one batch repeatedly tabulated at least 3 times) by [X number] of poll workers who remained AFTER all Poll Watchers (GOP and the like), press and all third parties were required to leave the premises per announcement at or about [AM] until [AM] in violation of election laws enacted by GA state legislature.”
	“Ruby Freeman (woman in purple shirt on video), now under arrest and providing evidence against GA SOS Stacey Abrams and DNC on advanced coordinated effort to commit voter / election fraud [need confirmation of arrest and evidence].”
<i>Rudy Giuliani, Christmas Is Not Canceled, It's Vital This Year Rudy Giuliani Ep. 96, RudyGiulianics.com (Dec. 23, 2020), https://perma.cc/FY6G-EEJD.</i>	
	“There’s a video recording in Fulton County, Georgia, of what is obviously, without any doubt, the theft of votes. You have to be a naive child or a completely dishonest partisan not to realize that the observers are being thrown out of the room. A phony excuse of a water main break was used. They still were thrown out of the room, didn’t want to leave. Once they were all left and a last check was done around the hall, the workers for Atlanta—for Fulton County—the five or six, one of whom has a history of voter fraud participation, Ruby Freeman, uh, they scurry under these desks. Hardly where you would keep ballots, right? And they start taking ballots out and then put

¹ The actionable statements were published and re-published in multiple places, this column provides only one source, and is not meant to provide an exhaustive list of the most relevant locations.

	<p>them on a wheelbarrow sort of thing and wheel them around. And you can see the ballots don't really look like, like absentee ballots that are in envelopes; they look more like pristine pieces of paper. And then they're given out and very quickly are being counted, counted, counted, counted, there are times in which it appears that they were being counted more than one time—three, four, five, six, seven times, eight times. . . . [I]t's quite clear no matter who they're doing it for, they're cheating. It looks like a bank heist."</p>
	<p>Rudy Giuliani, <i>Who Will Be Our President? The Current State of Our Country</i> Rudy Giuliani Ep. 97, RudyGiulianics.com (Dec. 25, 2020), https://perma.cc/8XLB-SS62.</p>
	<p>"Live from Fulton County, let's watch the Democrats steal the election! And there you see it. Ruby Freeman and her crew getting everybody out of the center, creating a false story that there was a—that there was a water main break. No water main break. They get everybody out. They wait, they wait, they wait. They check, they check, they check, like they're gonna do a heist, and all of a sudden the crooks sprang into action. They go under a desk covered like a casket, and they start pulling ballots out. Tremendous numbers of ballots. And they bring them over to one counting stand, all the way over here, another counting stand, another—and they keep looking around to make sure there's nobody in the room! . . . Every once in a while, you look closely, you can them doing this—one ballot [gestures scanning a ballot multiple times]. You know what that does? That takes Biden and multiplies it by 5."</p>
	<p>"[J]ust look at the tape. That accounts for anywhere from 40 to 80,000 votes. The number then when we look at it on, was like 138,000 for Biden and 2,000 for Trump. Take those out of their numbers— Trump won Georgia honestly. We want honest votes here."</p>
	<p>OAN, <i>EXCLUSIVE: OAN's Chanel Rion talks election fight with Rudy Giuliani</i>, OAN (Dec. 30, 2020), https://rumble.com/vcahxx-exclusive-oans-chanel-rion-talks-election-fight-with-rudy-giuliani.html.</p>
	<p>"There are five or six states that can make the difference here and that have the evidence already have the evidence that shows that the Biden people stole the election, and not only that, they have the evidence that shows that Trump actually had more votes. Georgia is maybe the easiest to demonstrate because it's on video. During that videotape, that we can all see right in front of our eyes, we can see them stealing the votes. We can see them throwing out the people. We can see them counting it four and five times. We also have the statistics during that period of time, 120,000 votes for Biden, couple hundred votes for Trump, no observers, makes it totally illegal. That alone changes the election. That alone means that if you get rid of those illegal votes, Trump wins Georgia by 40 or 50 thousand votes. . . . Georgia has the one video tape, I consider it like the Zapruder film was to the Kennedy assassination, this film will live for a hundred years. For a hundred years, this film will show that the, the 2020 presidential election, there was an attempt to steal it."</p>
	<p>"I've heard Democratic senators get on television and say it's espionage to say that it was fraud. You're not gonna tell me that. I see, I can see the fraud, it's in front of my eyes. What am I supposed to do, close my eyes and make believe that in Fulton County, Georgia, when they closed the doors, and they got rid of the public, and they</p>

	started triple counting ballots and it ends up being 120,000 for, for Biden and 3,000 for Trump? They weren't cheating? Am I stupid?"
	Rudy W. Giuliani, <i>I Can't Say This on National Television</i> Rudy Giuliani Ep. 98, YouTube (Dec. 30, 2020), https://web.archive.org/web/20210223225629/https://www.youtube.com/watch?v=7vRckA6PqGA .
	"[T]he Fulton County vote counting [videotape], which in and of itself proves that Georgia was stolen by, uh, Joe Biden and by the Democrats. That one video proves it."
	"[T]he first thing that the election workers do . . . is they, um, move out the observers. . . . [T]hey make sure there's no one around, they make sure the doors are locked so nobody else can come in, and then at a certain point they look around again, and they go under a table covered by a black, like a black blanket, and they start pulling out ballots. Now we begin with, why are ballots under a table? And then they start distributing those ballots for counting to three or four different areas where there are counting machines. And you can see it's done very hurriedly; it's done in a way suggesting that they are nervous about what they're doing, and by the way, even if these ballots were legitimate ballots, which I doubt they are, this would be entirely illegal. And every one of those ballots would be declared null and void because each one of these ballots is being counted in violation of the law of Georgia that in fact there must be the public present when ballots are being counted . . . [I]t looks an awful lot like a bank heist, doesn't it?"
	OAN, 1/18/2021 - Rudy Giuliani, Rep. Marjorie Taylor Greene, Brandon Tatum, Anna Paulina Luna & Peter Roff, Spotify (Jan. 19, 2021), https://perma.cc/HZ6F-WQ5Z .
	"I get banned from any of the big tech things when I say that not only was there voter fraud, I have evidence of it, I've seen it, I have a motion picture of it. I can show you the voter fraud in living color. It was done in Fulton County, Georgia, it was well over 30,000 ballots were stolen. They were attributed to Biden instead of Trump. Had they been caught and held to account for it, Trump would have won Georgia."
	OAN, <i>The Real Story - OAN Uncovering the Crime of the Century with Rudy Giuliani</i> , Rumble (June 14, 2021), https://perma.cc/6KZB-EBT3 .
	"But for sure there was fraud, you can't say there wasn't fraud. . . . The law of Georgia is that the ballots have to be counted in public. They deliberately threw people out and counted the ballots in private, and there's videotape of it. That wasn't enough. I don't know what you've got to do to prove it. They committed the crimes on video. You can see them do it. They lied about it. Then you can see these same people handing off flash drives to each other."
	"Well, I think Georgia is, uh, in terms of proof, the clearest proof . . . but, uh, in terms of proof, Georgia has every kind of proof you could possibly imagine." .
	"I mean, the explanation for that videotape is absurd because you can see them—you can see them throw the people out. And the law specifically says you can't count in private, so they threw the people out. They used this phony excuse that there was going

	<p>to be some kind of a water main break. It was not. There was no water main break, and then after the people were out—and you can just watch the way they're doing it. I mean, I've watched bank robberies. I mean, this, this looked like a bank robbery. They were doing it surreptitiously. And, uh, handing 'em off, and doing it quickly, and occasionally you can see them multiple count a vote. Now you take the two women who ran that, there are other tapes of them earlier in the day, handing off—handing off small, hard drives and flash drives, those flash drives were used to put in the machines—the machines that supposedly weren't, uh, accessible by internet, all of which were accessible by internet. So these women have gotten away scot-free.”</p>
	<p>“No one's even questioned them. I mean, you have to look at that videotape and say, as least there should be an investigation, and they should be put under oath as to what they were doing. . . . Republicans, Democrats, reporters, and everyone else. You see them unceremoniously ushered out. And then you see the woman check out the whole place to make sure there's nobody there and that's when they get the ballots from under the table, and that's when they start counting the ballots under the table.”</p>
	<p>“Another thing your listeners should understand, Natalie, is they did this in crooked Democratic cities. Not everywhere. This was a very, very well planned, executed, fraud.”</p>
<p><i>The Real Story – Exposing Disinformation with Rudy Giuliani</i>, Rumble (July 23, 2021), https://perma.cc/EC3V-TGDH.</p>	
	<p>“How about the videotape that I have where they're shoving the thing into the machine three and four times so they can be recounted by the same two women that earlier in the day were passing around hard drives or flash drives that supposedly can't be used in Dominion machines, but can.”</p>
	<p>“I have the truth.”</p>
<p><i>OAN, The Real Story - OAN Pennsylvania Shenanigans with Rudy Giuliani</i>, Rumble (Dec. 11, 2021), https://perma.cc/NJE9-BYGY.</p>	
	<p>“The situation in Georgia, uh, that videotape is about as clear evidence of stealing votes as I've ever seen. And it was mischaracterized by the Secretary of State, the crooked Governor Kemp, uh, the Democrats—I mean, they're all in league together. . . . In any event, you've got a tape in, in, in Georgia that's crystal clear, it looks like a, it looks like a bank robbery, my goodness. And, uh this [Pennsylvania tape] is very, very clear. There are about ten others. There's no doubt that people stole votes in that election for Biden, and the numbers are—I would say—way beyond what was necessary to switch the vote in about four states. But they certainly are extremely significant and can't be ignored. When people cheat in elections on some kind of substantial scale, how do you know in advance without investigating whether it affects the election or not? Right?” Am. Compl. ¶ 96.</p>
<p><i>Rudy Giuliani's Common Sense, Listen to What John Solomon Found Out About the Presidential Election! Rudy Giuliani Ep. 204, Rumble (Jan. 12, 2022)</i>, https://perma.cc/9HRD-2SGN.</p>	

	<p>“So you remember, remember the, the very famous video of the whole day of the, there was a, uh, the arena had a, had a, had a security camera that was unknown to the participants. So several days, if not weeks, after the election the, the, uh, company came forward with tapes of this very suspicious activity where the people were thrown out of the arena, the observers. All the doors were locked—.”</p>
Conspiracy Liability	
Team Trump (@TeamTrump), Twitter (Dec. 23, 2020, 10:02 AM), https://twitter.com/TeamTrump/status/1341760977470062597	While the State Farm Arena Video is displayed on screen, a voiceover states: “Ballots miraculously appeared, Biden Ballots added in the middle of the night.”
Team Trump (@TeamTrump), Twitter (Dec. 23, 2020, 2:18 PM), https://twitter.com/TeamTrump/status/1341825401371430913	While the State Farm Arena Video is displayed, a voiceover states: “Election observers in Georgia thought they were done counting for the night. But when they went home, security footage shows poll workers pulling out trunks containing ballots from overwhelmingly Democrat precincts. The media won’t admit it, but it’s on video.”
<i>Transcript: President Trump’s Phone Call With Georgia Election Officials</i> , N.Y. Times (Jan. 3, 2021), https://perma.cc/G7JW-AKQ8 .	
	“We had at least 18,000 that’s on tape – we had them counted very painstakingly – 18,000 voters having to do with Ruby Freeman. She’s a vote scammer, a professional vote scammer and hustler, Ruby Freeman.”
	“[T]hey said very clearly and it’s been reported that they said there was a major water main break. Everybody fled the area. And then they came back – Ruby Freeman, her daughter, and a few people. There were no Republican poll watchers.”
	“Late in the morning, they went – early in the morning, they went to the table with the black robe – the black shield and they pulled out the votes. Those votes were put there a number of hours before. The table was put there – I think it was – Brad, you would know. It was probably eight hours or seven hours before, and then it was stuffed with votes. They weren’t in an official voter box. They were in what looked to be suitcases or trunks – suitcases, but they weren’t in voter boxes.”
	“But it had slow motion and it was magnified many times over, and the minimum it was was 18,000 ballots, all for Biden.”
	“[W]e’re so far ahead of these numbers, even the phony ballots of Ruby Freeman – known scammer.”
	“That was – the minimum number is 18,000 for Ruby, but they think it’s probably about 56,000. But the minimum number is 18,000 on the Ruby Freeman night where she ran back in there when everybody was gone and stuffed – she stuffed the ballot boxes. Let’s face it, Brad. I mean, they did it in slow-motion replay magnified, right? She stuffed the ballot boxes. They were stuffed like nobody’s ever seen them stuffed before.”

	“She stuffed the ballot – each ballot went three times. They were showing here’s ballot number one, here it is a second, third time, next ballot.”
	“We have a new tape that we’re going to release. It’s devastating. And by the way, that one event, that one event is much more than the 11,000 votes that we’re talking about. It’s, you know, that one event was a disaster. And it’s just, you know, but it was, it was something, it can’t be disputed. And again, we have a version that you haven’t seen, but it’s magnified. It’s magnified, and you can see everything. For some reason, they put it in three times, each ballot, and I don’t know why. I don’t know why three times. Why not five times, right?”
	“[W]hy did they put the votes in three times? You know, they put them in three times.”
	“And the minimum – there were 18,000 ballots but they used them three times. So that’s, you know, a lot of votes. And that one event – and they were all to Biden, by the way; that’s the other thing we didn’t say. You know, Ruby Freeman, one thing I forgot to say which was the most important. Do you know that every single ballot she did went to Biden? You know that, right? Do you know that, by the way, Brad? Every single ballot that she did through the machines at early – early in the morning went to Biden. Did you know that, Ryan?”
	“No, they were 100 percent for Biden. One hundred percent. There wasn’t a Trump vote in the whole group.”
	“We’re way over that number, and just if you took just Ruby Freeman we’re over that number by five or six times when you multiply it out times three, and every single ballot went to Biden.”
Brian Naylor, Read Trump’s Jan. 6 Speech, a Key Part of Impeachment Trial, NPR (Feb. 10, 2021), https://perma.cc/ECA7-UE86 .	
	“In Fulton County, Republican poll watchers were ejected, in some cases, physically from the room under the false pretense of a pipe burst. Water main burst, everybody leave. Which we now know was a total lie.”
	“Then election officials pull boxes, Democrats, and suitcases of ballots out from under a table. You all saw it on television, totally fraudulent. And illegally scanned them for nearly two hours, totally unsupervised. Tens of thousands of votes. This act coincided with a mysterious vote dump of up to 100,000 votes for Joe Biden, almost none for Trump. Oh, that sounds fair. That was at 1:34 AM.”

IIED LIABILITY – EMOTIONAL HARM STATEMENTS	
11Alive, Second Georgia Senate Hearing, YouTube (Dec. 3, 2020), https://www.youtube.com/watch?v=hRCXUNOWQjw	Members of the Giuliani Legal Team for the Trump Campaign display the State Farm Arena Video and make numerous false statements alleging election fraud, primarily between time stamps 33:27 to 50:26.

Team Trump (@TeamTrump), Twitter (Dec. 3, 2020, 1:32 PM), https://twitter.com/TeamTrump/status/1334566301205925889?s=20	“Video footage from Georgia shows that poll workers were told to stop counting and leave, while 4 people stayed behind to continue counting ballots in private.” The post includes video clip from 12/03/2020 Georgia Senate Hearing and clips from the State Farm Arena Video.
Team Trump (officialteamtrump), Facebook (Dec. 3, 2020, 1:35 PM), https://www.facebook.com/officialteamtrump/posts/442373687164189/	Team Trump posting a video from OAN of the 12/03/2020 Georgia Senate Hearing with the caption “Video footage from Georgia shows that poll workers were told to stop counting and leave, while 4 people stayed behind to continue counting ballots in private.”
Team Trump (@TeamTrump), Twitter (Dec. 3, 2020, 1:44 PM), https://twitter.com/TeamTrump/status/1334569329334083586?s=20	“WATCH: Video footage from Georgia shows suitcases filled with ballots pulled from under a table AFTER supervisors told poll workers to leave room and 4 people stayed behind to keep counting votes” The post includes a video clip from the 12/03/2020 Georgia Senate Hearing and clips from the State Farm Arena Video.
Team Trump (officialteamtrump), Facebook (Dec. 3, 2020, 1:47 PM), https://www.facebook.com/watch/?v=415570162816880&ref=sharing	Team Trump posting a video from OAN of the 12/03/2020 Georgia Senate Hearing with title “Video from GA shows suitcases filled with ballots pulled from under a table AFTER poll workers left” and caption “WATCH: Video footage from Georgia shows suitcases filled with ballots pulled from under a table AFTER supervisors told poll workers to leave room and 4 people stayed behind to keep counting votes”
Donald J. Trump (@realDonaldTrump), Twitter (Dec. 3, 2020, 2:01 PM), https://twitter.comrealDonaldTrump/status/1334573529107460096?s=20	“Wow! Blockbuster testimony taking place right now in Georgia. Ballot stuffing by Dems when Republicans were forced to leave the large counting room. Plenty more coming, but this alone leads to an easy win of the State!”
Donald J. Trump (DonaldTrump), Facebook (Dec. 3, 2020, 2:05 PM), https://www.facebook.com/DonaldTrump/posts/pfbid03mdTepfMDxrwRxNyYZjnEJpRM1JVrGTiJBERJRxtzGADjH5bRecTRFU2B95Zqjwpl	“Wow! Blockbuster testimony taking place right now in Georgia. Ballot stuffing by Dems when Republicans were forced to leave the large counting room. Plenty more coming, but this alone leads to an easy win of the State!”
Rudy W. Giuliani (@Rudygiuliani), Twitter (Dec. 3, 2020, 2:48 PM), https://perma.cc/EGH5-NJK7?type=image	

	Mr. Giuliani retweeting a post by Jenna Ellis that says “The VIDEO EVIDENCE being shown in the Georgia Senate Hearing is SHOCKING. Room cleared at 10:30pm. 4 people stay behind. Thousands of ballots pulled from under a table in suitcases and scanned. FRAUD!!!”
	Rudy W. Giuliani (@Rudygiuliani), Twitter (Dec. 3, 2020, 2:49 PM), https://twitter.com/RudyGiuliani/status/1334585579510652928
	Mr. Giuliani retweeting a post from @TeamTrump that says “WATCH: Video footage from Georgia shows suitcases filled with ballots pulled from under a table AFTER supervisors told poll workers to leave room and 4 people stayed behind to keep counting votes” and includes a video clip from OAN that displays the State Farm Arena video.
	Rudy W. Giuliani (@Rudygiuliani), Twitter (Dec. 3, 2020, 5:09 PM), https://twitter.com/RudyGiuliani/status/1334620731045507073
	“ELECTION IN GEORGIA IS NOW PROVEN TO BE A FRAUD.”
	Donald J. Trump (@realDonaldTrump), Twitter (Dec. 3, 2020, 8:28 PM), https://twitter.comrealDonaldTrump/status/1334670866051981312?s=20 , https://perma.cc/2DTZ-LGVP?type=image
	“People in Georgia got caught cold bringing in massive numbers of ballots and putting them in “voting” machines. Great job @BrianKempGA”
	Donald J. Trump (DonaldTrump), Facebook (Dec. 3, 2020, 8:31 PM), https://www.facebook.com/DonaldTrump/posts/pfbid02XLaDprqW3pkznPkuF85DzDxFt03ja6Lr9RvNrWt9pp4DmGfrjYcYQZY1hdwSQql
	“People in Georgia got caught cold bringing in massive numbers of ballots and putting them in “voting” machines. Great job Brian Kemp!”
	Rudy W. Giuliani (@Rudygiuliani), Twitter (Dec. 3, 2020, 11:14 PM) https://perma.cc/PSL3-KBPP?type=image
	“The video tape doesn’t lie. Fulton County Democrats stole the election. It’s now beyond doubt. Go to the tape!”
	Rudy W. Giuliani (@Rudygiuliani), Twitter (Dec. 4, 2020, 10:12 AM), https://twitter.com/RudyGiuliani/status/1334878351970938883
	“The Georgia middle of the night theft of thousands of votes changes everything. Watch it and Biden is not-elect anything. Looks like Biden Democrats doing a bank heist. In 5 states there are 800 sworn statements of eyewitnesses to Democrat cheating. States changing.”
	Rudy W. Giuliani (@Rudygiuliani), Twitter (Dec. 4, 2020, 10:16 AM), https://twitter.com/RudyGiuliani/status/1334879342405488651
	“The Bank Heist tape changes the result in Georgia. The State Legislature has no choice but to assume its powers under the US Constitution, article II (1) [2] and select Trump electors. More important it seems they have the courage to do so.”

	Team Trump (officialteamtrump), Facebook (Dec. 4, 2020, 11:14 AM), https://www.facebook.com/watch/?v=1418372675161256&ref=sharing
	Team Trump posting a video of a Fox Business interview with Jenna Ellis in which she discusses the State Farm Arena Video. The post has the caption: "Jenna Ellis on the SHOCKING evidence presented to the Georgia State Senate."
	Rudy Giuliani, <i>Rudy Giuliani on 77WABC, This is For Our Founding Fathers</i> 12-04-2020 WABC77 (Dec. 4, 2020), https://web.archive.org/web/20201226084219/https://wabcradio.com/podcast/rudy-giuliani/
	"I can pick out criminality by smelling it, now you don't have to smell it, you can see it on tape."
	"I don't know if they would testify, they might take the Fifth, because, I mean, if they did what it looks like, if there ever was a US Attorney there, they would be prosecuted."
	"The whole day goes by, those ballots remain hidden, below that box. That sits there and nobody bothers to see what it is."
	"Then ask those criminals to come and explain it, explain why they kept those ballots under the table, kept them there all day, and didn't count them until every Republican and everyone else was thrown out of the room-because they were legitimate ballots? Let me cross examine them, okay? I bet I get them to confess."
	"When you watch that tape, which happened in the middle of the night, with no body there, with the Republicans thrown out and the ballots hidden under the table for 30 hours."
	"And when everybody is gone, and they check it out and they lock the doors."
	"We can put out a tape, like the one we did yesterday, that looks like a bank heist and they're stealing 30,000 votes in the middle of the night, after throwing everyone out."
	"It was done right in front of your eyes, except, it wasn't supposed to be done right in front of your eyes, because they had no idea they were being taped."
	Rudy W. Giuliani (@Rudygiuliani), Twitter (Dec. 4, 2020, 3:37 PM), https://twitter.com/RudyGiuliani/status/1334959988306042882
	"The "Bank Heist" tape changes the result in Georgia. The State Legislature has no choice but to assume its powers under the US Constitution, article II (1) [2] and select Trump electors. More important it seems to have the courage to do so."
	Rudy W. Giuliani (@Rudygiuliani), Twitter (Dec. 4, 2020, 5:04 PM), https://twitter.com/RudyGiuliani/status/1334982029117714432
	"Are we going to let Democrats steal the election in front of our faces. If we can't stand up to the pressure of saving our country from rampant voter fraud because we are afraid of the elite reaction, we better find more courageous people for our party"

<p>Rudy W. Giuliani (@Rudygiuliani), Twitter (Dec. 4, 2020, 6:03 PM), https://twitter.com/RudyGiuliani/status/1334996848977784833</p>	
<p>“How can it be disputed. It’s like disputing a bank robbery when you have 4 cameras showing the robbery.”</p>	
<p>Rudy W. Giuliani (@Rudygiuliani), Twitter (Dec. 4, 2020, 7:23 PM), https://twitter.com/RudyGiuliani/status/1335016923986350080</p>	
<p>“Tonight I examine the VIDEO EVIDENCE on RudysCommonSense.com - STAY TUNED!” and retweeting a post by Jenna Ellis that states “The VIDEO EVIDENCE being shown in the Georgia Senate Hearing is SHOCKING. Room cleared at 10:30pm. 4 people stay behind. Thousands of ballots pulled from under a table in suitcases and scanned. FRAUD!!!”</p>	
<p>Mr. Giuliani’s tweet also includes retweet of a post by Grant Stinchfield that contains a video clip of the State Farm Arena Video, with text that reads “This is a total game changer! Sure looks like ballot stuffing in GA! All caught on camera. Busted! @realDonaldTrump @JennaEllisEsq @RudyGiuliani #stopthesteal”</p>	
<p>Team Trump (officialteamtrump), Facebook (Dec. 4, 2020, 9:35 PM), https://www.facebook.com/watch/?v=3882207805156851&ref=sharing</p>	
<p>Team Trump posting a video of a NewsMax segment discussing and showing clips from the State Farm Arena Video. The post has the caption: “Grant Stinchfield on the SHOCKING video from Georgia: The greatest political heist in election history may have been caught on camera.”</p>	
<p>Team Trump (officialteamtrump), Facebook (Dec. 4, 2020, 9:40 PM), https://www.facebook.com/watch/?v=698568980796027&ref=sharing</p>	
<p>Team Trump posting a NewsMax video segment discussing the State Farm Arena Video and showing clips from the State Farm Arena Video. Post has the caption: “Congressman Jody Hice on the video from Georgia: You cannot sweep under the rug a BOMBSHELL video.”</p>	
<p>Donald J. Trump (@realDonaldTrump), Twitter (Dec. 4, 2020, 9:43 PM), https://twitter.comrealDonaldTrump/status/1335052022530379776?s=20</p>	
<p>Mr. Trump posting a NewsMax video segment discussing the State Farm Arena Video and showing clips from the State Farm Arena Video.</p>	
<p>Donald J. Trump (@realDonaldTrump), Twitter (Dec. 4, 2020, 9:44 PM), https://twitter.comrealDonaldTrump/status/1335052324780339200?s=20</p>	
<p>Mr. Trump posting a NewsMax video segment discussing the State Farm Arena Video and showing clips from the State Farm Arena Video.</p>	
<p>Team Trump (officialteamtrump), Facebook (Dec. 4, 2020, 9:47 PM), https://www.facebook.com/watch/?v=210637133970070&ref=sharing</p>	
<p>Team Trump posting video of a Fox News interview with Mr. Giuliani. At the end of the video, Mr. Giuliani says “So you look at Georgia, they’re already there. That tape</p>	

	<p>yesterday was dynamite. That tape alone, represents theft of more than enough votes, to turn the election around.”</p>
	<p>Donald J. Trump (@realDonaldTrump), Twitter (Dec. 4, 2020, 10:05 PM), https://twitter.comrealDonaldTrump/status/1335057703568355330?s=20</p>
	<p>Mr. Trump posting video of Fox News interview with Giuliani. At the end of the video, Mr. Giuliani says “So you look at Georgia, they’re already there. That tape yesterday was dynamite. That tape alone, represents theft of more than enough votes, to turn the election around.”</p>
	<p>Rudy W. Giuliani, <i>VIDEO EVIDENCE: Caught Red Handed, TRUMP WON Georgia</i> Rudy Giuliani Ep. 92, YouTube (Dec. 4, 2020), https://web.archive.org/web/20210222194933/https://www.youtube.com/watch?v=PchtaUsRH70</p>
	<p>The entire podcast episode discusses the State Farm Arena Video and Mr. Giuliani publishes numerous false statements about the State Farm Arena Video alleging election fraud. The State Farm Arena Video is displayed multiple times throughout the podcast.</p>
	<p>Some examples include:</p> <ul style="list-style-type: none">• “This is a swindle of major proportions. And now you're going to see a tape, honestly, makes it look like a bank heist in the middle of the night. Remember those great movies with Pierce Brosnan? You get in the bank the middle of the night, take that safe apart, nobody around, they'd wait until everybody leaves and –how come they didn't do it in front of the guards? Because they were committing a crime, and they'd get caught. Well, we're going to show to you today, under any other circumstances would be considered a breakthrough of major proportions. All these weeks of Republicans coming up with evidence, evidence, evidence, evidence, affidavits, expert opinions, even some tape recordings. Nothing like this. This is a bank heist pulled off in the middle of the night, clearly indicating that the Georgia Democrat party was stealing the election for Joe Biden on purpose and completely against the law.”• “So, let me play this for you now, and I think this will help you somewhat follow it, although it does happen quite fast, but it is of enormous significance. And by the way, the number of votes here flips. Without any doubt, Georgia from Biden, who hon dishonestly won it, to Trump, who honestly won it, and then there are about another 100, 000 votes that also we stolen, but this alone does it.”• “These aren't Republican County officials. These are Democrat County officials. Why should Republicans suffer for the crimes of Democrats? I know in Washington that's what they try to do, but in America people suffer for the crimes they committed. So, these 30, 000 votes should be taken right out of Biden's number, they were done by Biden's people. In fact, they were done so blatantly by Biden's people, our people were thrown out.”• “What's the point of bringing them in at 8 o'clock in the morning, not counting them right away in front of the observers and waiting until 1:30 in the morning

	and counting them then with nobody around? What that adds up to in any court in any trial in American is evidence of guilt.”
	Rudy W. Giuliani, <i>VIDEO EVIDENCE: Caught Red Handed, TRUMP WON Georgia</i> Rudy Giuliani Ep. 92, YouTube (Dec. 4, 2020), https://rudygiulianics.com/episode/video-evidence-caught-red-handed-trump-won-georgia-rudy-giuliani-ep-92/
	Contains the same false statements alleging election fraud as listed above.
	Rudy W. Giuliani (@Rudygiuliani), Twitter (Dec. 5, 2020, 1:49 PM), https://twitter.com/RudyGiuliani/status/1335295193625600000
	“VIDEO EVIDENCE: Caught Red Handed, TRUMP WON GEORGIA! Rudy Giuliani Analyzes Video Evidence Here: https://youtu.be/PchtaUsRH70 ”
	Rudy Giuliani, <i>Uncovering the Truth with Rudy Giuliani and Dr. Maria Ryan, Uncovering Voter Fraud in Georgia</i> 12-6-20 WABC77 (Dec. 6, 2020), https://web.archive.org/web/20210118135546/https://wabcradio.com/episode/uncovering-voter-fraud-in-georgia-12-6-20/
	During the radio show, Mr. Giuliani encourages listeners to go listen to Common Sense to view the video and discussed the video throughout.
	<p>Some examples include:</p> <ul style="list-style-type: none"> • “It shows four security cameras which they did not know were in the room.” • “These two women, there is another tape involving them, using USBs to invade the Dominion Machines, which is also illegal. These women are serial criminals and they just walk around free. They’ve got a new election coming up, they’re planning on cheating in that election.” • “There is no way you can debunk this, they are literally taking ballots out from under a table in the middle of the night with the doors closed, with the inspectors gone, and are counting the ballots. You don’t do that if it’s honest. You don’t throw the inspectors out and do it in the middle of the night if it is honest. Do they think we’re stupid?” • “I think when you see this, you are looking at professional vote thieves. These are people who make it a profession to steal votes and to steal elections.”
	Team Trump (@officialteamtrump), Facebook (Dec. 5, 2020, 8:41 PM), https://www.facebook.com/watch/?v=680278392683024&ref=sharing
	Team Trump posting a video of a Newsmax segment discussing and showing the State Farm Arena Video.
	77 WABC - Cats at Night with John Catsimatidis, <i>Former Mayor Rudy Giuliani</i> 12-6-20 WABC77 (Dec. 6, 2020), https://wabcradio.com/episode/former-mayor-rudy-giuliani-12-6-20/
	“We produced the most dramatic piece of evidence in the entire proceeding. Basically, it looked like a bank heist. At 1:30 in the morning, the democrats that were in charge, chased everybody out. The Press, the Republicans, even the other Democrats. They waited until everyone was gone, and this is all on video tape. And when they were gone, they reached under a table that had been covered for 12 hours and under the table

	were thousands and thousands of ballots. They took those ballots out and furiously counted them with no one looking until something like 6 in the morning. And it appears something like 148,000 votes for Biden and 7,000 votes for Trump.”
	“This is probably the clearest evidence of voter fraud that we’ve ever seen in America.”
	Rudy W. Giuliani (@Rudygiuliani), Twitter (Dec. 7, 2020, 10:09 AM), https://twitter.com/RudyGiuliani/status/1335964587473195008
	“A MUST WATCH - VIDEO EVIDENCE FROM GEORGIA! I analyze it here: https://youtu.be/PchtaUsRH70 ”
	Rudy W. Giuliani (@Rudygiuliani), Twitter (Dec. 7, 2020, 12:25 PM), https://twitter.com/RudyGiuliani/status/1335998988101804035
	Mr. Giuliani retweeting Burt Jones. Mr. Giuliani’s tweet reads: “This is showing real leadership to achieve an honest result in a state where the election was stolen right in front of our eyes. Captured for history by the security cameras.”
	Rudy W. Giuliani (@Rudygiuliani), Twitter (Dec. 8, 2020, 9:36 AM), https://twitter.com/RudyGiuliani/status/1336318757346701314
	“The Georgia Vote-Counting Video Was Not 'Debunked.' Not Even Close!!!”
	Rudy W. Giuliani (@Rudygiuliani), Twitter (Dec. 8, 2020, 9:49 PM), https://twitter.com/RudyGiuliani/status/1336503092238487554
	“The Georgia video proves now, and for posterity, that crooked Democrat officials stole the votes to try to win the state. And Republicans are covering up for them? The Gov., Lt. Gov., Sec’y of State and Legislature are submitting a statement they know is false. Why?”
	Rudy W. Giuliani (@Rudygiuliani), Twitter (Dec. 8, 2020, 10:10 AM), https://twitter.com/RudyGiuliani/status/1336327207946309633
	“A MUST WATCH! VIDEO EVIDENCE: The election was stolen right in front of our eyes. Captured for history by the security cameras. Rudy Giuliani Analyzes Video Evidence Here: http://youtu.be/PchtaUsRH70 ”
	Rudy W. Giuliani (@Rudygiuliani), Twitter (Dec. 9, 2020, 2:26 PM), https://twitter.com/RudyGiuliani/status/1336754076084744193
	“The Georgia video evidence PROVES now, and for posterity, that crooked Democrat officials stole the votes to try to win the state! Republicans are covering up for them. Why? I analyze the video evidence here: https://youtu.be/PchtaUsRH70 ”
	77 WABC - Cats at Night with John Catsimatidis, <i>Rudy Giuliani Cats at Night 12-09-2020 WABC77 </i> (Dec. 9, 2020), https://wabcradio.com/episode/rudy-giuliani-cats-at-night-12-09-2020/
	Mr. Giuliani begins describing the State Farm Arena Video, though he mistakenly calls it the tape from Chicago. Mr. Giuliani compares the State Farm Arena Video to the Zapruder Film comparison “Right in front of your eyes, Georgia is stolen. And the

	weak politicians of Georgia, including their very very disturbed Governor, can't seem to stand up to it."
	Rudy W. Giuliani (@Rudygiuliani), Twitter (Dec. 10, 2020, 7:31 AM), https://twitter.com/RudyGiuliani/status/1337011946953072641
	“Back 100% and lost little time. Testifying at 11Am before Georgia legislature on the additional “Live from Atlanta” election theft tapes. No evidence of fraud. Watch the Video tapes and make up your own mind.”
	Rudy W. Giuliani (@Rudygiuliani), Twitter (Dec. 10, 2020, 11:43 AM), https://twitter.com/RudyGiuliani/status/1337075352150138885
	Mr. Giuliani retweeting a Team Trump post that includes a video of Giuliani and his team testifying at the 12/10/2020 Georgia Senate Hearing. The underlying Team Trump post includes clips from the State Farm Arena Video.
	Team Trump (@TeamTrump), Twitter (Dec. 10, 2020, 11:26 AM), https://twitter.com/TeamTrump/status/1337071276750495744
	“Mayor @RudyGiuliani plays the video footage from Georgia showing suitcases filled with ballots pulled from under a table AFTER supervisors told poll workers to leave room” Includes video clip from 12/10/2020 Georgia Senate Hearing and clips from the State Farm Arena Video.
	Donald J. Trump (@realDonaldTrump), Twitter (Dec. 10, 2020, 9:37 AM), https://twitter.comrealDonaldTrump/status/133704373991578292?s=20
	Mr. Trump tweets “Voter Fraud!” and retweets a post by Grant Stinchfield that contains video clips of the State Farm Arena video. The underlying tweet by Grant Stinchfield reads “I examined the GA video of those mysterious ballots. Watch the woman in purple. She appears to feed the same ballots through twice!!! It appears she does this three times! There is nothing “normal” about this!!! More at 8ET @newsmax @RudyGiuliani @JennaEllisEsq @realDonaldTrump.”
	Right Side Broadcasting Network, <i>LIVE: Georgia House of Representatives Hearing on Election Irregularities</i> 12/10/20, YouTube (Dec. 10, 2020), https://www.youtube.com/watch?v=pFs0Jag1Msc
	Members of the Giuliani Legal Team for the Trump Campaign display the State Farm Arena Video and make numerous false statements alleging election fraud. Mr. Giuliani narrates the State Farm Arena Video and makes numerous false statements about Ruby Freeman and Shaye Moss between time stamps 1:56:00 to 2:15:35.
	Examples include: <ul style="list-style-type: none">• “I'd also like to focus on the two people that are involved in this, because I spent most of my life as a United States Attorney and Associate Attorney General and a criminal prosecutor, and I've prosecuted I think some of the worst criminals of the last century. People shouldn't get away with this. I'm not sure I know the names of these people. I think I do. I think the woman in charge here is named

	<p>Ruby Freeman, and I think her daughter Shaye Freeman Moss either was helping her here or helping her earlier, because earlier in the day these two were engaged in another apparent voter fraud in which they were passing out USB ports which were being used, apparently, you know, to infiltrate the crooked Dominion voting machines and getting data out of it or change data in it[.]”</p> <ul style="list-style-type: none">• “[I]t's a tape earlier in the day of Ruby Freeman and Shaye Freeman Moss and one other gentleman quite obviously surreptitiously passing around USB ports as if they're vials of heroin or cocaine. I mean, it's out -- it's obvious to anyone who's a criminal investigator or prosecutor they are engaged in surreptitious, illegal activity again that day, and a week ago they're still walking around Georgia. Why? Should have been -- they should have been questioned already. Their places of work, their homes should have been searched for evidence of ballots, for evidence of USB ports, for evidence of voter fraud, because they obviously were engaged in it and it's available to 300 million Americans to watch.”
	<p>Rudy Giuliani, <i>Rudy Giuliani on 77WABC, This is For Our Founding Fathers</i> 12-04-2020 WABC77 (Dec. 4, 2020), https://web.archive.org/web/20201226084219/https://wabcradio.com/podcast/rudy-giuliani/</p>
	<p>“How the governor and this guy Raffensperger can look at that tape of those women stealing votes, 100%, 1000% no doubt, stealing votes, right in front of your eyes—it's like an insult to the rest of the country.”</p>
	<p>“It demonstrates for over 2 hours the democratic electors in Georgia stealing votes and entering them for Biden that should have been entered for Trump.”</p>
	<p>Donald J. Trump (@realDonaldTrump), Twitter (Dec. 11, 2020, 6:05 PM), https://twitter.comrealDonaldTrump/status/1337534034377920523?s=20</p>
	<p>Mr. Trump posting a Trump Campaign advertisement. While the State Farm Arena Video is displayed in the advertisement, a voiceover states: “Ballots miraculously appeared, Biden Ballots added in the middle of the night.”</p>
	<p>Donald J. Trump (@realDonaldTrump), Twitter (Dec. 11, 2020, 6:34 PM), https://twitter.comrealDonaldTrump/status/1337541208831307776?s=20</p>
	<p>Mr. Trump posting a Trump Campaign advertisement. While the State Farm Arena Video is displayed in the advertisement, a voiceover states: “Suitcases of ballots added in secret in Georgia.”</p>
	<p>Team Trump (@officialteamtrump), Facebook (Dec. 11, 2020, 5:58 PM), https://www.facebook.com/watch/?v=235460347988996&ref=sharing</p>
	<p>Team Trump posting a Trump Campaign advertisement. While the State Farm Arena Video is displayed in the advertisement, a voiceover states: “Ballots miraculously appeared, Biden Ballots added in the middle of the night.”</p>

<u>Team Trump (@officialteamtrump), Facebook (Dec. 11, 2020, 5:56 PM), https://www.facebook.com/watch/?v=213721697011947&ref=sharing</u>	
	Team Trump posting a Trump Campaign advertisement. While the State Farm Arena Video is displayed in the advertisement, a voiceover states: "Suitcases of ballots added in secret in Georgia."
Donald J. Trump (@realDonaldTrump), Twitter (Dec. 16, 2020, 2:01 PM), https://twitter.comrealDonaldTrump/status/1339284435456421892?s=20	Mr. Trump posting a Trump Campaign advertisement. While the State Farm Arena Video is displayed in the advertisement, a voiceover states: "Ballots miraculously appeared, Biden Ballots added in the middle of the night."
Donald J. Trump (@realDonaldTrump), Twitter (Dec. 22, 2020, 8:08 PM), https://twitter.comrealDonaldTrump/status/1341551177146757121?s=20	Mr. Trump posting a video from an OAN segment alleging election fraud and showing the State Farm Arena Video. The segment mentions Ms. Freeman by name.